

S. AMANDA MARSHALL, OSB #95347

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District of Oregon

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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

v.

COMPLAINT IN REM
FOR FORFEITURE

19740 STATE HIGHWAY 42, CAMAS
VALLEY, DOUGLAS COUNTY,
STATE AND DISTRICT OF
OREGON, REAL PROPERTY WITH
BUILDINGS, APPURTENANCES
AND IMPROVEMENTS, *in rem*,

Defendant.

Plaintiff, United States of America, by S. Amanda Marshall, United States Attorney for the District of Oregon, and Amy Potter, Assistant United States Attorney, for its complaint *in rem* for forfeiture, alleges:

I.

This Court has subject matter jurisdiction, *in rem* jurisdiction, and venue pursuant to 21 U.S.C. § 881; 28 U.S.C. §§ 1345, 1355, 1356, and 1395; and 19 U.S.C. § 1610.

II.

Defendant, *in rem*, 19740 State Highway 42, Camas Valley, Douglas County, State and District of Oregon, real property with buildings, appurtenances and improvements and more particularly described as follows:

Beginning at a point in the center of the County Road 8.57 chains South and 30.33 chains West from the quarter section corner between Sections 29 and 30, Township 29 South, Range 8 West, Douglas County, Oregon; thence running North 89° 15' East 13.05 chains; thence North 12.00 chains; thence South 89° 15' West 3.65 chains; thence South 37° 50' West 15.35 chains to place of beginning.

EXCEPTING THEREFROM the property described in Book 1052, Page 849, Recorder's No. 89-3713, Records of Douglas County, Oregon.

is now and during the pendency of this action will be within the jurisdiction of this Court.

III.

Defendant, *in rem*, 19740 State Highway 42, Camas Valley, Douglas County, State and District of Oregon, real property with buildings, appurtenances and improvements, represents real property that was used or intended to be used, in any manner or part, to commit, or to facilitate a transaction in violation of 21 U.S.C. § 801, *et. seq.*, and is forfeitable to the United States pursuant to the provisions of 21 U.S.C. § 881(a)(7), as more particularly set forth in the declaration of Special Agent Jon LaFollette, Drug Enforcement Administration marked as Exhibit A, attached and fully incorporated herein by this reference.

WHEREFORE, plaintiff, United States of America, prays that due process issue to enforce the forfeiture of defendant, *in rem*, real property commonly known

as 19740 State Highway 42, Camas Valley, Douglas County, State and District of Oregon, with buildings, appurtenances and improvements; that due notice be given to all interested persons to appear and show cause why forfeiture of this defendant, *in rem*, should not be decreed; that due proceedings be had thereon; that this defendant be forfeited to the United States; that the plaintiff United States of America be awarded its costs and disbursements incurred in this action.

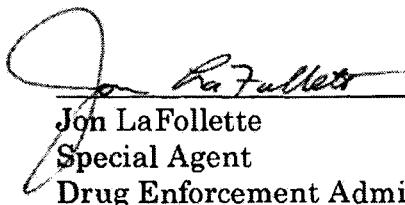
Respectfully submitted this 7th day of November, 2012.

S. AMANDA MARSHALL
United States Attorney

/s/ Amy E. Potter
AMY E. POTTER
Assistant United States Attorney

VERIFICATION

I, JON LAFOLLETTE, declare, under penalty of perjury, pursuant to the provisions of 28 U.S.C. Section 1746, that I am a Special Agent with the Drug Enforcement Administration and that the foregoing Complaint *in rem* for Forfeiture is made on the basis of information officially furnished and upon the basis of such information the Complaint *in rem* for Forfeiture is true as I verily believe.



Jon LaFollette
Jon LaFollette
Special Agent
Drug Enforcement Administration